REMARKS

Status of Claims

Applicant respectfully requests reconsideration and allowance of all of the claims of the Application. The status of the claims is as follows:

- Claims 1-46 are currently pending;
- No claims are canceled herein;
- No claims are withdrawn herein;
- Claims 1, 7, 12, 17, 20, 23, 33 and 38 are amended herein;
- No new claims are added herein; and
- Claims 1, 12, 17, 20, 23, 33 and 38 are independent.

Support for the amendments to the claims is found in the specification, for example, at least at paragraphs 0084-0093, 0102, 0103 of Applicant's published application, US2005/0210151.

Cited Documents

The following documents have been applied to reject one or more claims of the Application:

- **Whiting**: Whiting et al., U.S. Patent No. 5,146,221
- **Vidal**: Vidal et al., U.S. Patent Application Publication No. 2002/0078241
- **Tokunaga**: Tokunaga et al., U.S. Patent No. 5,968,132

Claim Rejections under 35 USC § 103(a)

Claims 1-16 and 23-46 stand rejected under 35 USC § 103(a) as allegedly being obvious over Whiting in view of Vidal. Claims 17-22 stand rejected under 35 USC § 103(a) as allegedly being obvious over Whiting in view of Vidal, and further in view of Tokunaga. Applicant respectfully traverses these rejections, and requests reconsideration and withdrawal of the rejections for the following reasons.

Independent Claims 1, 12 and 20

Applicant submits that the combination of Whiting with Vidal, Tokunaga and/or the other art of record does not teach or suggest at least the following elements, as recited in independent claim 1 (with emphasis added):

> ... compressing the data at the first device by finding an index in a lookup table that matches an initial sequence in the data, wherein:
>
> the lookup table includes a plurality of entries, each said entry being discoverable utilizing a particular one of a plurality of said indices; and
>
> each said entry references whether a corresponding said index is located in a history buffer, and if so, further references one or more locations of the corresponding said index in the history buffer; and
>
> if the corresponding said entry of the matching index references a plurality of said locations:
>
> for each said location, comparing a sequence at the location having the matching index with a sequence in the data, said sequence including the initial sequence;
>
> deriving a matching sequence from the comparison based on at least one of a length and the location of the sequence at each said location; and
>
> representing the matching sequence using a representation that includes the length and the location of the matching sequence in the history buffer;

forming compressed data that includes at least one of said representations;

further compressing the compressed data by encoding the at least one representation, wherein the at least one representation is encoded using a first Huffman table for encoding the length using Huffman encoding and using a last recently used (LRU) table for encoding the location of the matching sequence in the history buffer, wherein the LRU table lists a plurality of recently used locations of recent matching sequences, wherein, when the location of the matching sequence is not in the LRU table, the location of the matching sequence is encoded with Huffman encoding using a second Huffman table, different from the first Huffman table; and

streaming the compressed data over the network to the second device.

At page 4 of the Office Action, it is conceded that Whiting does not teach the further compressing compressed data. Instead, the Office Action asserts that Vidal teaches this element of the above-emphasized clause of claim 1, citing paragraphs 0041 and 0042 of Vidal, along with col. 15, lines 11-24 of Whiting, with no articulation as to how these two references are combinable to teach this clause of Applicant's claim 1.

In particular the cited portions of Vidal merely describe the following:

> [0041] In a preferred embodiment of the invention, the compression algorithm may operate as follows. First, the algorithm may search for symbols (characters) that appear more frequently than others in the data. Then, *the algorithm may build a tree, for example a Huffman Tree, as is known in the art, that stores the symbols and their respective frequencies*. Each symbol may then be assigned with a code whose length is inversely proportional to the frequency of the symbol. For example if the symbol `A` appears significantly more frequently than the symbol `B`, then the code length of `A` should be shorter than that of `B`. During the encoding process, the algorithm may write the symbol code into memory, instead of the data corresponding to the symbol. This code includes information sufficient to reconstruct the symbol and its frequency. Thus, during decoding, the code may be read and the Huffman tree may

be used to reconstruct the original data, as is known in the art. The tree itself may be transferred together with the compressed data, as part of the general compression header as is known in the art (Vidal, col. 29, lines 26-40 – emphasis added).

[0042] In order to determine whether a file is compressible, and if so, which compression algorithm should optimally be used, the compress program may perform the following. First, the compress program may read a block of data having a predetermined size, for example, a block size of about 7 Kilobytes has been found suitable for 56 Kbps modem communication links. *Then, the compress programs* [sic] *tries to compress the block using various algorithms, for example, either or both of the above described dictionary and Huffman encoding algorithms. The compress program may also try various combinations of the algorithms described above and/or other algorithms. Based on these trials, the compress program selects the algorithm or combination of algorithms which yields the highest compression ratio.* At this point, the compress program may determine whether the compression ratio is sufficiently high to warrant compression of the entire file, as indicated at block 60, by determining if the compression ratio exceeds a preset threshold. The threshold may correspond to a reduction of a predetermined percentage of the amount of data in the chunk due to compression, for example, a 5% reduction, or any other threshold that yields optimal results based on experimentation with a specific file format. If the compression ratio is determined to be sufficiently high, the compress program proceeds to write the compressed data block onto the disk. However, if the compression ratio is not sufficient, i.e., the size of the original file may not be significantly reduced, then the compress program may write the original data block to disk (Vidal, col. 29, lines 26-40 – emphasis added).

From a review of the above-reproduced portion of Vidal, and the remainder of Vidal, Applicant has been unable to discern any portion that teaches or suggests ***further compressing the compressed data by encoding the at least one representation***, as recited in Applicant's claim 1. Instead, Vidal merely discusses that "the compress programs tries to compress the block *using various algorithms, for example, either or both of the above described dictionary and Huffman encoding*

algorithms" (Vidal, par. 0042 – emphasis added) "*The compress program may also try various combinations of the algorithms described above and/or other algorithms*" (Vidal, par. 0042 – emphasis added). "Based on these trials, the compress program selects the algorithm or combination of algorithms which yields the highest compression ratio" (Vidal, par. 0042). Thus, Applicant respectfully submits that there is no teaching or suggestion in Vidal of ***further compressing the compressed data by encoding the at least one representation***, as recited in Applicant's claim 1. For example, Vidal merely provides a general statement that "various combinations" of algorithms may be tried. Consequently, Vidal provides no enablement regarding compressing at least one representation of compressed data, or even a suggestion this concept. Accordingly, Applicant respectfully submits that Vidal provides no teaching or suggestion regarding ***further compressing the compressed data by encoding the at least one representation***, as recited in Applicant's claim 1.

Furthermore, the cited portion of Whiting fails to make up for the shortcomings in Vidal pointed out above. For example, the cited portion of Whiting merely describes the following:

> At block 174, a determination is made as to whether the current string of length MATCHLEN+1 at location HISTORY (NEXT) is equal to the contents of the internal match buffer. *The internal match buffer contains all MATCHLEN bytes of the currently matching string.* This buffer allows faster searching for a new string if the initial attempt to match this string fails. An efficiency occurs because the bytes to be matched are immediately available within the chip instead of having to reach them from RAM each time a match is performed. Stated differently, the matching buffer acts as a look aside buffer to efficiently enhance processing. The match buffer is of finite length (MAXSTR=8 bytes in the preferred embodiment) (Whiting, col. 15, lines 11-24 – emphasis added).

From a review of the above-reproduced portion of Whiting, and the remainder of Whiting, Applicant has been unable to discern any portion of Whiting that teaches or suggests ***further compressing the compressed data by encoding the at least one representation***, as recited in Applicant's claim 1. Instead, Whiting merely discusses that an "internal match buffer contains all MATCHLEN bytes of the currently matching string" (Whiting, col. 15, lines 14-16). Accordingly, Applicant respectfully submits that the combination of Whiting with Vidal does not teach or suggest at least this portion of the above-emphasized clause of Applicant's claim 1, and claim 1 is allowable for this aspect.

Furthermore, Applicant respectfully submits that there is no teaching or suggestion in Whiting or Vidal of ***wherein the at least one representation is encoded using a first Huffman table for encoding the length using Huffman encoding and using a last recently used (LRU) table for encoding the location of the matching sequence in the history buffer, wherein the LRU table lists a plurality of recently used locations of recent matching sequences, wherein, when the location of the matching sequence is not in the LRU table, the location of the matching sequence is encoded with Huffman encoding using a second Huffman table, different from the first Huffman table***, as also recited in Applicant's claim 1. From a review of the cited sections of Vidal and Whiting, as set forth above, Applicant has been unable to discern any portion of these references that teaches or suggests these elements. Instead, Vidal merely describes that "the compress programs tries to compress the block *using various algorithms, for example, either or both of the above described dictionary and Huffman encoding algorithms*" (Vidal, par. 0042 – emphasis added) "*The*

compress program may also try various combinations of the algorithms described above and/or other algorithms" (Vidal, par. 0042 – emphasis added). Additionally, Whiting merely describes that an "internal match buffer contains all MATCHLEN bytes of the currently matching string" (Whiting, col. 15, lines 14-16). Accordingly, Applicant respectfully submits that the combination of Whiting with Vidal does not teach or suggest at least these additional elements of the above-emphasized clause of Applicant's claim 1.

Applicant has shown above by direct quotation that the cited portions of Whiting and Vidal are very different on their faces from the above-emphasized clauses of Applicant's claim 1. Accordingly, insofar as that Whiting and Vidal do not teach or suggest at least the above-emphasized clause of Applicant's claim 1, and insofar as that the Examiner has failed to present any evidence or explanation that actually connects the cited portions of Whiting and Vidal to the express language of Applicant's claim 1, as discussed above, Applicant respectfully points out that the documents cited by the Examiner do not establish a *prima facie* case of unpatentability of Applicant's claim 1.

Furthermore, given that Applicant has shown above what Whiting and Vidal actually recite, Applicant respectfully points out that Applicant's Application is the only objectively verifiable Examiner-cited document of record that teaches what the Examiner purports Whiting and Vidal to teach. From this, and the express recitations of Whiting and Vidal, as set forth above, it follows that the Examiner is inadvertently interpreting Whiting and Vidal through the lens of Applicant's Application, which is

impermissible hindsight. Thus, the Examiner's assertions regarding Whiting and Vidal as teaching Applicant's claim 1 are untenable for at least the foregoing reasons.

Tokunaga does not make up for the shortcomings in the teachings of Whiting and Vidal pointed out above. In view of the foregoing, Applicant respectfully submits that claim 1 is allowable over Whiting, Vidal, Tokunaga and/or the other art of record, and is in condition for allowance. Applicant respectfully requests that the Examiner withdraw the rejection of claim 1. Further, for at least the foregoing reasons, Applicant respectfully asks the Examiner to hold claim 1 allowable and to issue a Notice of Allowance of same.

Independent claims 12 and 20 include limitations similar to those discussed above with respect to claim 1, and are allowable under a similar rationale. Applicant respectfully requests that the Examiner withdraw the rejections of claims 12 and 20. Further, for at least the foregoing reasons, Applicant respectfully asks the Examiner to hold independent claims 12 and 20 allowable and to issue a Notice of Allowance of same.

Independent Claim 17

Applicant submits that the combination of Whiting with Vidal, Tokunaga and/or the other art of record does not teach or suggest at least the following elements, as recited in independent claim 17 (with emphasis added):

> ... adding data to a history buffer at the first device for compression;
>
> updating a lookup table that references the history buffer to include the added data, wherein:

the lookup table includes a plurality of entries, each said entry being discoverable utilizing a particular one of a plurality of indices; and

each said entry references whether a corresponding said index is located in the history buffer, and if so, further references one or more locations of the corresponding said index in the history buffer;

starting a current pointer at the added data in the history buffer;

finding one said index in the lookup table that matches an initial sequence at the current pointer;

determining that the corresponding said entry of the matching index references a plurality of said locations;

comparing a sequence at each said location having the matching index with a sequence in the added data that includes the initial sequence;

deriving a matching sequence from the comparison;

representing the matching sequence with a representation that includes the location and a length of the matching sequence in the history buffer;

forming compressed from the packet of data that includes the representation;

advancing the current pointer by the length of the matching sequence;

when the current pointer has advanced through the packet of data, packetizing the compressed data for streaming;

streaming the packetized compressed data over the network to the second device;

receiving feedback that indicates availability of resources for communicating the packetized compressed data over the network from the first device to the second device; and

tuning one or more parameters of the compression process utilized to compress the packetized compressed data in response to the feedback, wherein the tuning comprises increasing a size of a search window used for sequence matching in the compression process when the feedback indicates that the compressed data is being transmitted over the network at a lower than expected rate.

Applicant respectfully notes that Tokunaga does not disclose ***tuning one or more parameters of the compression process utilized to compress the packetized compressed data in response to the feedback, wherein the tuning comprises increasing a size of a search window used for sequence matching in the compression process when the feedback indicates that the compressed data is being transmitted over the network at a lower than expected rate***, as recited in Applicant's claim 17. Instead, at column 3, lines 23-40, Tokunaga merely describes the following:

> The image data communicating apparatus Ia may have a first image data compressing unit for compressing image data that should be transmitted. In addition, the image data communicating apparatus may further have a *compression parameter controlling unit for variably controlling a compression parameter* by the first image data compressing unit so as to bring the number of frames close to the number of frames initially set by the communication data quantity adjusting unit 4 if the traffic detecting unit 3 judges that image data cannot be transferred in an initial quantity of communication data (Tokunaga, col. 3, lines 23-33).
>
> Further, the above compression parameter controlling unit may have a table in which a compression parameter used by the first image data compressing unit for a change in traffic is stored to variably control the compression parameter by referring to the table on the basis of a change in traffic detected by the traffic detecting unit 3 (Tokunaga, col. 3, lines 34-40).

From the foregoing, it is apparent that Tokunaga merely describes a compression parameter controlling unit for variably controlling a compression parameter (col. 3, lines 27-29). Consequently, Tokunaga does not disclose, teach or suggest ***tuning one or more parameters of the compression process utilized to compress the packetized compressed data in response to the feedback, wherein the tuning comprises increasing a size of a search window used for sequence matching in***

the compression process when the feedback indicates that the compressed data is being transmitted over the network at a lower than expected rate, as recited in Applicant's claim 17.

At page 2 of the Office Action, the Examiner asserts that Whiting can be combined with Tokunaga to teach the above-emphasized clause of Applicant's claim 17, citing col. 11, lines 6-7 of Whiting. However, Applicant respectfully notes that the cited portion of Whiting merely describes the following:

> A hash table 100 is utilized to quickly find specified strings in the history array 102. The hash table 100 is made up of a series of bin entries which contain history array pointers in to the history array. Another data structure called the offset array 104 is a hash link table. The first item in each linked list in the offset array 104 points to the previous entry in the history array which corresponds to a particular hash value, and the last item (which may be an invalid pointer) in the linked list points to the oldest entry associated with this hash value. The compression unit 4 maintains a 16-bit history pointer HPTR 108 which is incremented after each input byte is processed. HPTR is initialized to 0 and wraps back to 0 after 64K bytes have been processed by the compression unit. The offset array 104 is actually a secondary hash which consists of a singly linked list. *If a particular offset is greater than MEMSIZE-MAXSTR (where MAXSTR is the maximum string being searched) or if the sum of all the links from the most recent entry of the list is greater than MEMSIZE-MAXSTR, then there are no further valid entries in the particular hash bin (value).* In this way, the entries older than MEMSIZE-MAXSTR effectively "fall off" the end of the history array 102. This aspect of the present invention allows use of a singly linked list in the offset array 104, which can be maintained with less than half the memory accesses compared to a doubly linked list. Use of the singly linked list, however, necessitates a hash refresh operation which is discussed below (Whiting, col. 10, line 57, through col. 11, line 17 – emphasis added).

From a review of the above-reproduced portion of Whiting, and the remainder of Whiting, Applicant has been unable to discern any portion of Whiting that teaches or

suggests the above-emphasized clause of Applicant's claim 17. Instead, Whiting merely discusses that a value "MAXSTR is the maximum string being searched" (Whiting, col. 11, lines 6-7). Applicant respectfully submits that there is no teaching or suggestion here, or elsewhere in Whiting of ***wherein the tuning comprises increasing a size of a search window used for sequence matching in the compression process when the feedback indicates that the compressed data is being transmitted over the network at a lower than expected rate***, as recited in Applicant's claim 17. Applicant respectfully notes that there is no teaching or suggestion in Whiting, for example, of changing a size of MAXSTR, as suggested by the Examiner for tuning purposes.

Applicant has shown above by direct quotation that the cited portions of Whiting and Tokunaga are very different on their faces from the above-emphasized clause of Applicant's claim 17. Accordingly, insofar as that Whiting and Tokunaga do not teach or suggest at least the above-emphasized clause of Applicant's claim 17, and insofar as that the Examiner has failed to present any evidence or explanation that actually connects the cited portions of Whiting and Tokunaga to the express language of Applicant's claim 17, as discussed above, Applicant respectfully points out that the documents cited by the Examiner do not establish a *prima facie* case of unpatentability of Applicant's claim 17.

Furthermore, given that Applicant has shown above what Whiting and Tokunaga actually recite, Applicant respectfully points out that Applicant's Application is the only objectively verifiable Examiner-cited document of record that teaches what the Examiner purports Whiting and Tokunaga to teach. From this, and the express

recitations of Whiting and Tokunaga, as set forth above, it follows that the Examiner is inadvertently interpreting Whiting and Tokunaga through the lens of Applicant's Application, which is impermissible hindsight. Thus, the Examiner's assertions regarding Whiting and Tokunaga as teaching Applicant's claim 17 are untenable for at least the foregoing reasons.

Vidal fails to make up for the shortcomings in Whiting and Tokunaga pointed out above. In view of the foregoing, Applicant respectfully submits that claim 17 is allowable over Whiting, Vidal, Tokunaga and/or the other art of record, and is in condition for allowance. Applicant respectfully requests that the Examiner withdraw the rejection of claim 17. Further, for at least the foregoing reasons, Applicant respectfully asks the Examiner to hold claim 17 allowable and to issue a Notice of Allowance of same.

Independent Claims 23 and 38

Applicant submits that the combination of Whiting with Vidal, Tokunaga and/or the other art of record does not teach or suggest at least the following elements, as recited in independent claim 23 (with emphasis added):

> ... a processor and a memory, the memory including a compression module executed by the server for implementing:
>
> a history buffer having a plurality of bytes;
>
> a lookup table that includes a plurality of entries, each said entry:
>
> being discoverable utilizing a particular one of a plurality of indices; and
>
> references whether a corresponding said index is located in the history buffer, and if so, further references one or more locations of the corresponding said index in the history buffer; and

the compression module being executable to:

find one said index sequence in the lookup table that matches an initial sequence in data for communication to a client from a terminal service;

determine that the corresponding said entry of the matching index references a plurality of said locations;

for each said location, compare a sequence at the location having the matching index with a sequence in the data, said sequence including the initial sequence;

derive a matching sequence from the comparison based on at least one of a length and the location of the sequence at each said location;

represent the matching sequence using a representation that includes the length and the location of the matching sequence in the history buffer;

compress at least a portion of the representation by encoding the representation, wherein the representation is encoded using a first Huffman table for encoding the length using Huffman encoding and using a last recently used (LRU) table for encoding the location of the matching sequence in the history buffer, wherein the LRU table lists a plurality of recently used locations of recent matching sequences, wherein, when the location of the matching sequence is not in the LRU table, the location of the matching sequence is encoded with Huffman encoding using a second Huffman table, different from the first Huffman table; and

periodically recalculate the first Huffman table and the second Huffman table following processing of a predetermined number of packets of the data.

Claim 23 includes limitations similar to those discussed above with respect to claim 1, and is allowable under a similar rationale. In addition, claim 23 includes that the server is configured to ***periodically recalculate the first Huffman table and the second Huffman table following processing of a predetermined number of packets of the data***. From a review of Whiting, Vidal, Tokunaga, and the other art of record, Applicant has been unable to discern any portion of these documents that

teaches or suggests this aspect. Accordingly, Applicant respectfully submits that independent claim 23 is allowable over the art of record for this aspect as well.

In view of the foregoing, Applicant respectfully submits that claim 23 is allowable over Whiting, Vidal, Tokunaga and/or the other art of record, and is in condition for allowance. Applicant respectfully requests that the Examiner withdraw the rejection of claim 23. Further, for at least the foregoing reasons, Applicant respectfully asks the Examiner to hold claim 23 allowable and to issue a Notice of Allowance of same.

Independent claim 38 includes limitations similar to those discussed above with respect to claim 23, and is allowable under a similar rationale. Applicant respectfully requests that the Examiner withdraw the rejection of claim 38. Further, for at least the foregoing reasons, Applicant respectfully asks the Examiner to hold independent claim 38 allowable and to issue a Notice of Allowance of same.

Independent Claim 33

Applicant submits that the combination of Whiting with Vidal, Tokunaga and/or the other art of record does not teach or suggest at least the following elements, as recited in independent claim 33 (with emphasis added):

> ... a network;
>
> a server including a first processor and a first memory and further comprising:
>
> a first history buffer having a plurality of bytes;
>
> a lookup table that includes a plurality of entries, each said entry being discoverable utilizing a particular one of a plurality of indices, each said entry references whether a corresponding said

index is location in the history buffer, and if so, one or more locations of the corresponding said index in the history buffer;

a first Huffman table that includes codes for lengths of matching sequences;

a second Huffman table, different from the first Huffman table, that includes codes for locations of matching sequences and literal bytes; and

a compression module that is executable by the server to:

find one said index in the lookup table that matches an initial sequence at a current pointer in data to be streamed in response to a request for remote access;

if the corresponding said entry of the matching index references one or more said locations:

compare a sequence at each said location having the matching index with a sequence in the data at the current pointer;

derive a matching sequence from the comparison;

configure data to include a representation that includes the location and a length of the matching sequence in the first history buffer, encode the length using the first Huffman table, encode the location of the matching sequence using a last recently used (LRU) table, wherein the LRU table lists a plurality of recently used locations of recent matching sequences, wherein, when the location of the matching sequence is not in the LRU table, the location of the matching sequence is encoded using the second Huffman table, and advance the current pointer by the length of the matching sequence;

if the corresponding said entry of the matching index does not reference any said location, configure data to include the initial sequence, encode literal bytes of the initial sequence using the second Huffman table, and advance the current pointer by a length of the initial sequence; and

when the current pointer has advanced through the added data, further configure the data into packets, and stream the packetized configured data over the network; and

a client including a second processor and a second memory, the client being communicatively coupled to the network for communication with the server and including a second said history buffer, a third Huffman table that includes codes for decoding locations of matching sequences and literal bytes, a fourth Huffman table that includes codes for decoding lengths of matching sequences, the LRU table, and a decompression

module that is executable by the client to decompress the streamed data;

wherein the client is configured to receive the configured data;

wherein, when an encoded representation is present in the configured data, the decompression module is configured decode the representation using the LRU table, the third and fourth Huffman tables and finds the matching sequence in the second said history buffer based on the decoded location and the decoded length indicated by the representation.

Claim 33 includes limitations similar to those discussed above with respect to claim 1, and is allowable under a similar rationale. In addition, claim 33 includes ***wherein, when an encoded representation is present in the configured data, the decompression module is configured decode the representation using the LRU table, the third and fourth Huffman tables and finds the matching sequence in the second said history buffer based on the decoded location and the decoded length indicated by the representation***. From a review of Whiting, Vidal, Tokunaga, and the other art of record, Applicant has been unable to discern any portion of these documents that teaches or suggests this aspect. For example, Vidal merely discusses that "the compress programs tries to compress the block *using various algorithms, for example, either or both of the above described dictionary and Huffman encoding algorithms*" (Vidal, par. 0042 – emphasis added) "The compress program may also try various combinations of the algorithms described above and/or other algorithms" (Vidal, par. 0042 – emphasis added). "Based on these trials, the compress program selects the algorithm or combination of algorithms which yields the highest compression ratio" (Vidal, par. 0042). Thus, Applicant respectfully submits that Vidal does not teach or suggest these elements.

Furthermore, Whiting merely discusses that an "internal match buffer contains all MATCHLEN bytes of the currently matching string" (Whiting, col. 15, lines 14-16). Accordingly, Applicant respectfully submits that the combination of Whiting with Vidal does not teach or suggest ***wherein, when an encoded representation is present in the configured data, the decompression module is configured decode the representation using the LRU table, the third and fourth Huffman tables and finds the matching sequence in the second said history buffer based on the decoded location and the decoded length indicated by the representation***, as recited in Applicant's claim 33.

In view of the foregoing, Applicant respectfully submits that claim 33 is allowable over Whiting, Vidal, Tokunaga and/or the other art of record, and is in condition for allowance. Applicant respectfully requests that the Examiner withdraw the rejection of claim 33. Further, for at least the foregoing reasons, Applicant respectfully asks the Examiner to hold claim 33 allowable and to issue a Notice of Allowance of same.

Dependent Claims

In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant requests that the Examiner withdraw the rejection of each dependent claim where its base claim is allowable.

Conclusion

Applicant submits that all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

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Representative for Applicant

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